

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA)	CASE NO. 1:18CR518
)	
Plaintiff)	JUDGE POLSTER
)	
-vs-)	<u>MOTION TO MODIFY</u>
)	<u>BOND CONDITIONS</u>
EDWARD MARRERO)	
)	
Defendant)	

Now comes Defendant, who respectfully moves this Honorable Court for a modification of his bond conditions, by REMOVING THE ELECTRONICALLY MONITORED HOME DETENTION condition, for the following reasons:

- 1) On July 6, 2018, Defendant was released on bond under electronically monitored home detention.
- 2) At the time that said bond was ordered, Defendant was charged with Sexual Exploitation of Children, carrying a mandatory minimum 15 year prison term; and Possession of Visual Depictions of a Minor Engaged in Sexually Explicit Conduct, carrying a mandatory minimum prison term of 5 years.
- 3) On February 19, 2019, Defendant pled guilty to a single count of False Statement, a substantially less serious charge.
- 4) Since July 6, 2018, Defendant has had no violations of home detention, and has reported regularly to pre-trial services as ordered.

- 5) Defendant respectfully contends that the home detention condition is not necessary to further secure his appearance in court or to insure the safety of the community, as Defendant has demonstrated over the past 8+ months, that he is not a flight risk nor a danger to the community.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of this motion was filed electronically.

S/ Gregory S. Robey
GREGORY SCOTT ROBEY